

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:18 CR 00828 RLW
)	
MARKESE WATKINS,)	
)	
Defendant.)	

DEFENDANT WATKINS' SENTENCING MEMORANDUM

Introduction

On February 27, 2020, the Defendant, Markese D. Watkins, entered pleas of guilty to six (6) Counts of a Superseding Indictment. Since his arrest on October 8, Mr. Watkins has not in any way attempted to deny or otherwise deflect on his conduct which resulted in his guilty pleas. On the contrary, he has done all that has been asked of him and has totally accepted responsibility for his actions.

Calculations under the U.S. Sentencing Guidelines

Pursuant to the U.S. Sentencing Guidelines, Mr. Watkins' range of punishment on Counts 1, 2, 10 and 12 is a range of 51 – 63 months and on Counts 11 and 13, seven (7) years, each to be served consecutive to any other Count. (*See* PSR, ¶¶ 115, 116, p. 21, Doc. 325).

Sentence to be Imposed

Pursuant to the Plea Agreement entered into by the Government and Mr. Watkins, the parties agree that Mr. Watkins would not seek a sentence of less than fourteen (14) years (*See* Plea Agreement, p. 2, Doc. 237) and, further, the parties understand that the Court is neither a party to nor bound by the recommendations.

From and shortly after his arrest on October 9, 2018, in the matter of *United States v. Markese D. Watkins*, Case No. 4: 18 CR 00845, Mr. Watkins has accepted wholly accepted responsibility for his actions. It should be noted that Case No. 4:18 CR 00845 was dismissed on December 11, 2018 (Doc. 26) inasmuch as the incident which was at issue was incorporated in the instant Indictment, as Count 2.

Further, it should be noted that Mr. Watkins has been in continuous custody since October 9, 2018, approximately 34 months, without any significant untoward incidents. Further, as a result of his status and the demands on the U.S. Marshal's Service, he has been moved to multiple facilities

Rather, we would ask this Honorable Court to sentence him to the least amount of time that it deems prudent in its wisdom and in accordance with the recommendation contained within the Plea Agreement.

Conclusion

For the forgoing reasons, Defendant requests that this Honorable Court impose a sentence as follows:

- (1) Impose a sentence, not to exceed fourteen (14) years.

(2) Inasmuch as Defendant has a zero net worth and no income or expenditures due to his incarceration, we would ask the Court to follow the recommendation of the Probation Office wherein it is stated that, “[b]ased upon the defendant’s current financial condition, it does not appear he has the ability to pay a fine.” (PSR, Financial Condition, ¶ 113, p. 20).

(3) Defendant pay the special assessment of \$400 forthwith.

(4) Defendant acknowledges that restitution is due and owing but that any amount of restitution be predicated on his economic status.

(5) That the Court recommend his placement in a facility as close as possible to the metropolitan St. Louis area.

(6) That the Court recommend that Defendant be allowed to participate in vocational, occupational and/or apprenticeship training relative to automotive mechanics in the Bureau of Prisons.

(7) That the Court recommend placement in the Residential Drug Abuse Program.

(8) For such other Orders as the Court deems just and proper.

Respectfully submitted

/S/ JoANN TROG

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2021, a true and correct copy has been filed electronically with the Clerk of Court and a copy thereof to Gregory Goodwin, Assistant United States Attorney, 111 South 10th Street, 20th Floor, St. Louis, Missouri 63102.

I hereby certify that on August 24, 2021, a copy of the foregoing was sent via e-mail to Stacie Dixon (Stacie_Dixon@moep.uscourts.gov), United States Probation Office, 111 South 10th Street, 2nd Floor, St. Louis, Missouri 63102.

/s/ **JoANN TROG**